AFFIDAVIT OF CHRISTIAN M. FIERABEND
IN SUPPORT OF A CRIMINAL COMPLAINT

I, Christian M. Fierabend, do hereby depose and state as follows:

1. I am a Special Agent of the Federal Bureau of Investigation ("FBI") and have been so employed for ten years. I am currently assigned to the Boston Division of the FBI in Boston, Massachusetts. I am currently assigned to the Boston Violent Crimes Task Force, which is comprised of personnel of the FBI, Massachusetts State Police, and the Boston, Malden, Saugus, and Somerville Police Departments.

2. As a Special Agent with the Violent Crimes Task Force, I have responded to numerous bank robberies. I have also received specialized training regarding investigative techniques, evidence collection, and evidence preservation.

3. I am aware that Title 18 of the United States Code, section 2113(a) makes it a crime for anyone by force and violence, or by intimidation, to take, or attempt to take, from the person or presence of another, any property or money or any other thing of value belonging to, or in the care custody, control, management, or possession of, any federally insured bank. I am further aware that 18 U.S.C. § 2113(d) increases the potential penalty for anyone to violate 2113(d) and, in so doing, to assault any person, or put

in jeopardy the life of any person by the use of a dangerous weapon or device. Having so said, I make this affidavit in support of a criminal complaint charging Albert Taderera ("Taderera") (DOB XX/XX/1981) of Brighton, Massachusetts, with: the robbery of a branch of the TD Bank located at 54 Boston Post road, Wayland Massachusetts, on October 7, 2016. The facts stated herein are based on my own personal involvement in this investigation and my discussions with other law enforcement officers also involved in the investigation. In submitting this affidavit, however, I have not included each and every fact known to me about the investigation, but only those facts which I believe are sufficient to establish the requisite probable cause that the above mentioned crime was committed by Albert Taderera

INVESTIGATION

4. Between February 14, 2015 and March 2, 2017, sixteen banks were robbed in the Metro-West and Greater Boston areas. In most of the robberies, the victim tellers described the robber ("robber") as a thin male approximately 6′ in height. In all of the robberies, the robber wore a dark hooded sweatshirt, a dark colored hat, a dark mask and/or sunglasses covering his face, black gloves, and dark outer clothing. In each of the robberies, the robber entered the bank and made verbal demands for the bank's money. In many of the robberies, the robber

displayed what appeared to be a black semi-automatic handgun.

5. In all of the robberies, the banks' video surveillance cameras captured images consistent with the victim tellers' descriptions.

6. Many of the robberies occurred in suburban settings where the banks were freestanding that featured adjacent wooded areas/foliage. In many of the robberies, witnesses observed the robber leaving the banks following the robbery, and entering into these wooded areas. In many of the robberies witnesses observed the robber run toward, enter into, and then leave the area in a black BMW sedan.

7. In four of the robberies, independent witnesses reported observing a black BMW sedan near the banks prior to the robberies. In many of the robberies, witnesses reported observing a black male appearing to conduct surveillance from wooded areas near the banks prior to the robberies. Additionally, the same witnesses reported viewing a black BMW sedan, prior to each robbery, near the respective banks.

8. Based on the above, the VCTF believes that the same individual driving the same BMW is responsible for the robberies.

ENCOUNTER WITH TADERERA AND THE BMW

9. Utilizing intelligence garnered from the robber's past bank robberies, the VCTF developed an initiative to identify potential towns, and banks within those towns, believed to be consistent to the robber's modus-operandi ("MO"). On March 9, 2017, members of the VCTF and Concord Police Department conducted surveillance of multiple banks in Concord, Massachusetts. A TD Bank and a Citizens Bank, adjacent to each other on Main Street in West Concord, were identified as banks that are consistent with the robber's MO based on the bank's proximity to wooded areas and access to a highway. The VCTF requested that the Concord Police conduct routine patrols around the aforementioned banks in an effort to identify the robber while he conducted pre-robbery surveillance. Concord Police were provided the robber's description and the make and color of the vehicle he may have utilized, a black BMW sedan.

10. On March 16, 2017, while conducting routine patrol of Citizens and TD Banks on Main Street in West Concord, Concord Police observed a black BMW sedan matching the description of the robber's vehicle. Additionally, Concord Police observed an individual sitting in a black BMW sedan matching the robber's description. As Concord Police entered one of the bank's parking lots, the black BMW sedan exited its parking spot and drove

towards an apartment complex nearby the bank. Based on the vehicle's activity, and proximity to the banks, Concord Police initiated a vehicle stop and initiated a query of the BMW's license plate. The query indicted that the registration for the BMW was revoked.

11. Concord Police identified the operator of the vehicle as Albert Taderera ("Taderera") DOB XX/XX/1981. Taderera's listed residence is in Brighton, Massachusetts. Concord Police questioned Taderera as to why he was parked outside the banks. Taderera informed Concord Police that he was going to visit an acquaintance in the apartment complex. Taderera provided Officers the name of an individual that had no association with the referenced apartment complex. He was unable to provide Officers with additional information.

12. After Concord Police verified the BMW's license plates were revoked, Officers impounded Taderera's BMW. Per department policy, the BMW was inventoried and towed to an impound lot in Billerica, Massachusetts. The BMW was later transferred to the FBI impound lot in Wilmington, MA. Taderera was allowed to take a few personal items from the vehicle. Officers observed Taderera take a pair of gloves and sunglasses. Law enforcement noted that Taderera is an African-American male, approximately 6'0 with a thin build.

13. While conducting the inventory search of the BMW, law enforcement noted that the BMW was equipped with a BMW Navigation Module. Law enforcement later learned that this Navigation Module has the capacity to record a vast amount of user related data, including the vehicle's navigation history, cell logs, contact lists, installed applications, and text messages.

14. Based on my training and experience and the training and experience of other law enforcement officers with whom I have had discussions, I know that there are certain characteristics of individuals who rob banks. Among other things, individuals who rob banks sometimes utilize maps and navigation aids such as GPS or cell phones to determine locations of banks. Additionally, I know that individuals sometimes utilize maps and other navigation aids such as GPS or cell phones to determine roads and highways at or near banks to aid in their flight following a robbery. Finally, I know that individuals who rob banks sometimes utilize cell phones to verify addresses or to speak with others before or after a robbery. As a result, information regarding the vehicle's location, navigation usage, and cell phone usage will be stored on the vehicle's Navigation Module.

15. On March 20, 2017, I interviewed Taderera's ex-wife Anjala Manuelpillai ("Manuelpillai"). Manuelpillai reviewed the various banks' video surveillance footage and stills from the various banks' depicting the robber. Manuelpillai stated that she believed the individual in the video and in the still pictures was Taderera. Manuelpillai stated that she recognized Taderera from his height, his build, and his gait.

16. On March 23, 2017, this Court issued a search warrant authorizing the FBI to search the BMW's navigation Module. The search of the BMW's Navigation Module is being conducted on the morning of March 24, 2017.

THE OCTOBER 7, 2016 ROBBERY OF THE TD BANK

17. On October 7, 2016, at approximately 6:05 p.m., an individual entered a branch of the TD Bank located at 54 Boston Post Road, Wayland, Massachusetts. The individual ("the robber") brandished what appeared to be a black semi-automatic handgun and ordered tellers to get behind the counter and give him money. The robber stated, in substance, "I don't want to hurt anybody but I will if I have to." The tellers gave the robber money from their cash drawers which he, the robber, placed into a pouch he was carrying. The robber then exited the bank through the rear exit.

18. A post-robbery audit revealed that the teller had given the robber $8,142.00 in United States currency.

19. Following the robbery tellers who had interacted with the robber described him as a black male, 20-30 years old with a thin build. The tellers also stated that the robber was wearing a black hooded jacket, a facemask, dark sunglasses, jeans and dark gloves.

20. Bank surveillance cameras were functioning and operating on the date of the robbery. The cameras captured images of the robber consistent with the tellers' descriptions.

21. Following the robbery law enforcement obtained video footage from a video surveillance camera from a building that is next to the bank. This video footage shows that prior to the robbery an individual approached the bank from a wooded area behind the bank. Following the robbery, this video additionally shows an individual exiting the area and running away from the bank towards the vicinity of 16 Boston Post Road. The video then shows a dark colored sedan departing the area from the vicinity of 16 Boston Post Road.

22. An individual who works at 16 Boston Post Road stated that on the date of the robbery, between the 2:00 p.m. and 2:30 p.m., she observed a black male with sunglasses driving a BMW

sedan circling the parking lot area between 16 Boston Post Road and 30 Boston Post Road.

23. This location, 16 Boston Post Road, is approximately 0.1 miles from the TD Bank.

24. Two other individuals who work in the area stated that on the date of the robbery, between 2:00 p.m. and 3:00 p.m., they observed a black male standing in the woods behind the bank.

FURTHER INVESTIGATION

25. On Wednesday, March 22, 2017, the FBI received information that the company that had towed the BMW had received a telephone call from an individual identifying himself as Taderera seeking information regarding the return of the BMW. The tow company told this individual in substance that the vehicle was in police custody.

26. On Thursday, March 23, 2017, at approximately 10:15 p.m., I received notice from an agent with U.S. Customs and Border Protection ("CBP") that Taderera had booked a flight scheduled to leave on Friday, March 24, 2017, at 11:00 a.m., from Dulles International Airport in Washington D.C. to Addis Ababa, Ethiopia. I subsequently learned that Taderera had rebooked this flight and was now planning to take a flight on

Friday, March 24, 2017 at 5:40 p.m., from Dulles International Airport to South Africa.

27. On Friday, March 24, 2017, at approximately 10:30 a.m., I learned that Taderera was on a flight that had left Logan Airport enroute to Reagan Airport in Washington D.C.

CONCLUSION

28. Based on the foregoing, I believe there is probable cause to believe that on October 7, 2017, Albert Taderera did, by force and violence, and by intimidation take $8,142.00 in U.S. currency from a branch of TD Bank in Wayland, Massachusetts, a bank insured by the Federal Deposit Insurance Corporation, and did, committing such offense, assault and put in jeopardy the life of a person by the use of a dangerous weapon, in violation of 18 U.S.C. §2113(a) and (d).

CHRISTIAN M. FIERABEND
FBI Special Agent

Sworn and subscribed to before me this 24th day of March, 2017.

Marianne B. Bowler, USMJ

MARIANNE B. BOWLER
UNITED STATES MAGISTRATE JUDGE